

BILLY J. WILLIAMS, OSB #901366
Acting United States Attorney
District of Oregon
Michelle H. Kerin, OSB #965278
Assistant United States Attorney
1000 SW Third Ave., Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

3:13 CR 00332 K1

GEOFFREY S. WALSH
Defendant.

**STIPULATED AGREEMENT FOR
PRIVATE SALE OF REAL
PROPERTY**

IT IS HEREBY STIPULATED by and between the United States of America, by and through its' counsel, Assistant United States Attorney Michelle H. Kerin, Assistant United States Attorney Katherine C. Lorenz, and Defendant Geoffrey S. Walsh by and through his attorney David M. Angeli (hereinafter the "parties") authorizing the immediate sale of certain real property located at 77752 Tradition Drive, La Quinta, California, ("subject real property") legally described as follows:

A PARCEL OF LAND LOCATED IN THE STATE OF CALIFORNIA, COUNTY OF RIVERSIDE, WITH A SITUS ADDRESS OF 77752 TRADITION DR, LA QUINTA, CA 92253 CURRENTLY OWNED BY TERWILLIGER CURVES LLC HAVING A TAX ASSESSOR NUMBER OF 658-426-018 AND BEING THE SAME PROPERTY MORE FULLY DESCRIBED AS UNIT 273 BLK 64 C, 156/090 INT IN COMM LOT 13 TR 31379 MB 367/047 AND SCRIBED IN DOCUMENT NUMBER 453024 DATED 09/07/2011 AND RECORDED 10/14/2011,

July 22

1. Pursuant to a Plea Agreement entered on June 2015, Defendant

Geoffrey S. Walsh voluntarily agrees to liquidate "subject real property" surrendering the proceeds of such sale to pay the anticipated restitution judgment resulting from the above cited criminal case against said Defendant. Defendant Geoffrey S. Walsh agrees to execute any and all documents necessary to convey clear title to subject real property.

2. Therefore, the parties agree that Defendant, Geoffrey S. Walsh as member of Terwilliger Curves, LLC, the record owner of the subject real property, shall immediately offer the subject real property for private sale through a licensed real estate broker. Selection of such real estate broker shall be subject to approval by the United States, real estate commissions shall not exceed 6%. Sale shall be processed through escrow by a reputable title insurance company, title insurance shall be provided to the buyer. Defendant shall obtain approval from the United States for any proposed sale. To that end defendant shall timely provide the United States with any and all documents related to proposed sales, including, but not limited to the offer, earnest money agreement or purchase contract, preliminary and final settlement statements, contact information for the real estate broker and the title/escrow company. Defendant shall provide the United States with advance notice of the date and location of any scheduled closing. The United States may in its sole discretion, reject any offer

to purchase the subject property where it determines that the offer is being made by persons working in concert with or on behalf of the defendant. The United States may reject any offer which is determined to be for less than a reasonable market value.

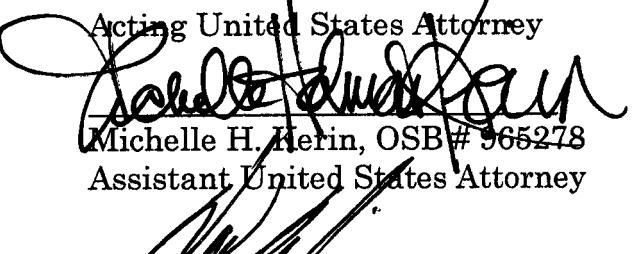
3. Escrow instructions shall be established directing all proceeds of said sale, less outstanding encumbrances, property taxes, and reasonable sales expenses, be made payable to the Clerk of the United States District Court, Portland, Oregon, and delivered directly to the Clerk of said District Court. Defendant shall not procure any loans secured by the subject property.

4. This Stipulated Agreement for Private Sale of Real Property authorizes the sale of the 77752 Tradition Drive property only, and will be in effect for a period of time not to exceed 180 days from the signing of this agreement, unless specifically extended by the United States.

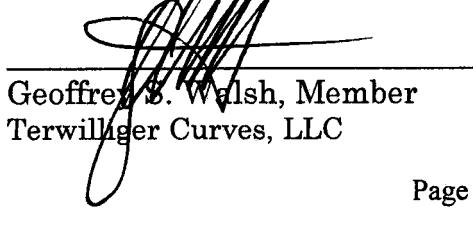
July
Dated this 21 Day of June, 2015.

Respectfully submitted,

BILLY J. WILLIAMS
Acting United States Attorney


Michelle H. Herin, OSB # 965278
Assistant United States Attorney

David H. Angeli,
Angeli, Unger Law Group LLC
121 SW Morrison, Suite 400
Portland, Oregon 97205
Attorney for Geoffrey S. Walsh


Geoffrey S. Walsh, Member
Terwilliger Curves, LLC